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March 16, 2017

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Filed Electronically Via ECFS

Marlene H. Dortch, Secretary Office of the Secretary Federal Communications Commission 445 12th Street, SW, Room TW-A325 Washington, DC 20554

> Re: Notice of Ex Parte Meeting WP Docket No. 16-261 RM-11719 RM-11722

Dear Ms. Dortch:

The Central Station Alarm Association and the related Alarm Industry Communications Committee ("AICC")(collectively "CSAA") has worked with the Land Mobile Communications Council (LMCC) to draft suggested revisions to Rule Sections 90.35(c) and 90.267(f) of the Commission's Rules. The draft revisions are designed to implement the terms of the Consensus Plan for greater use of the central station alarm frequencies attached to the December 22, 2016 Reply Comments of LMCC and CSAA. The resulting proposed rule change language on which CSAA and LMCC have agreed is attached hereto, in both "clean" and "redline" versions. CSAA and LMCC submit this language into the record in this proceeding to assist with the Commission's evaluation of the Consensus Plan.

Consistent with Section 1.1206 of the Commission's Rules, 47 C.F.R. §1.1206, one copy of this notice is being filed electronically and in native format in the above-captioned proceeding.

Please direct any questions concerning the above matter to the undersigned at (202) 828-5540.

Sincerely,

/s/

John A. Prendergast Counsel for CSAA

ce: Mark Crosby, LMCC
Liz Sachs, Esq.
Scot Stone, FCC
Matthew Pearl, FCC
Stana Kimball, FCC
Melvin Spann, FCC

CENTRAL STATION ALARM FREQUENCIES: PROPOSED RULE CHANGES

Rule Section 90.35(c) changes:

(63) Except as described below, within the boundaries of urbanized areas of 200,000 or more population, defined in the United States Census of Population, 1960, vol. 1, table 23, page 1-50, this frequency may be used only by persons rendering a central station commercial protection service within the service area of the radio station utilizing the frequency and may be used only for communications pertaining to safety of life and property, and for maintenance or testing of the protection facilities. Central Station commercial protection service is defined as an electrical protection and supervisory service rendered to the public from and by a central station accepted and certified by one or more of the recognized rating agencies, or the Underwriters Laboratories' (UL), or Factory Mutual System. Within those boundaries, the following frequencies can be licensed to other stations in the Industrial/Business Pool, for FB8 operations that meet the requirements of Rule Section 90.187 with regard to non-central station licenses upon concurrence of the Central Station Alarm Association for the purpose of protecting incumbent central stations from co-channel and adjacent channel interference: 460.90000 MHz, 465.90000 MHz, 460.92500 MHz, 465.92500 MHz, 460.95000 MHz and 465.95000 MHz. The Central Station Alarm Association shall utilize protection criteria developed in cooperation with the Land Mobile Communications Council that adequately protect fixed radios that have been designated as "mobiles". Other stations in the Industrial/Business Pool may be licensed on this frequency when all base, mobile relay and control stations are located at least 120 km (75 miles) from the city center or centers of the specified urbanized areas of 200,000 or more population. Central station operations licensed for primary voice and/or data on such frequencies will be protected as FB8 operations, even if operating in conventional mode. With respect to combination urbanized areas containing more than one city, 120 km (75 mile) separation shall be maintained from each city center which is included in the urbanized area. The locations of centers of cities are determined from appendix, page 226, of the U.S. Commerce publication "Air Line Distance Between Cities in the United States."

CSAA will not be required to concur in, and other frequency coordinators shall not coordinate, an application for a central station urbanized area channel (or a central station nationwide channel with a waiver request) if the proposed frequency assignment would utilize the last available central station full power channel pair within a 75-mile radius of the center coordinates of the urbanized area(s) defined in this Rule Section.

- (64) Persons who render a central station commercial protection service are authorized to operate fixed stations on this frequency for the transmission of tone or impulse signals on a coprimary basis to base/mobile operations. Fixed stations may be licensed as mobiles. Fixed stations used for central station alarm operations may utilize antennas mounted not more than 7 meters (20 feet) above a man-made supporting structure, including antenna structure.
 - (i) The output power shall not exceed 30 watts (at the remote site).
 - (ii) A1D, A2D, F1D, or F2D emission may be authorized.
- (iii) Operational fixed stations authorized under this paragraph are exempt from the requirements of §§90.137(b), 90.429(d), 90.425 and 90.433.

- (83) Telemetry operations on this frequency will be authorized pursuant to §90.267(f).
- (87) Operation on this frequency is subject to the low power provisions of §90.267(f). This frequency is assigned to Group D in the low power pool.

90.267 Changes:

- (f) *Group D Frequencies*. The Industrial/Business Pool frequencies in Group D are available for central station alarm operations on a coordinated basis, pursuant to §§90.35(b)(2) and 90.175(b). Central station alarm signaling on these frequencies will be co-primary with regard to co-channel or adjacent channel base, mobile or data operations. Voice operations will not be allowed on Group D Channels.
- (1) Base, mobile or operational fixed stations will be authorized on Group D frequencies. Fixed stations may be licensed as mobile.
- (2) Group D frequencies subject to §90.35(c)(63) are limited to central station alarm use within the urban areas described in §90.35(c)(63). Outside the urban areas described in §90.35(c)(63), Group D frequencies subject to §90.35(c)(63) are available for general Industrial/Business use on a coordinated basis, pursuant to §§90.35(b)(2) and 90.175(b).
- (3) Group D frequencies subject to §90.35(c)(66) are limited to central station alarm use nationwide.
- (4) Operation on Group D frequencies is limited to 2 watts output power for mobile, base or operational fixed stations. Fixed stations used for central station alarm operations may utilize antennas mounted not more than 7 meters (20 feet) above a man-made supporting structure, including antenna structure.
 - (5) The Industrial/Business Pool Group D Low Power Frequencies are as follows:

460/465.90625	460/465.95625	461/466.00625
460/465.9125	460/465.9625	461/466.0125
460/466.91875	460/465.96875	461/466.01875
460/465.93125	460/465.98125	
460/465.9375	460/465.9875	
460/465.94375	460/465.99375	

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CSAA will not be required to concur in, and other frequency coordinators shall not coordinate, an application for a central station urbanized area channel (or a central station nationwide channel with a waiver request) if the proposed frequency assignment would utilize the last available central station full power channel pair within a 75-mile radius of the center coordinates of the urbanized area(s) defined in this Rule Section.

(64) Persons who render a central station commercial protection service are authorized to operate fixed stations on this frequency for the transmission of tone or impulse signals on a coprimary basis to base/mobile operations. Fixed stations may be licensed as mobiles. Fixed stations used for central station alarm operations may utilize antennas mounted not more than 7 meters (20 feet) above a man-made supporting structure, including antenna structure. secondary, noninterference base-to-base/mobile operations subject to the following conditions and limitations:

	(i) Secondary fixed operations may be used only for the following
purposes:	
	(A) Indication of equipment malfunction;
-	(B) Actuation of a device to indicate the presence of an intruder,
fire, or other hazardo	us condition on the property under the protection of the licensee;

- (C) Indication of an abnormal condition in facilities under the protection of the licensee that, if not promptly reported, would result in danger to human life; (D) Transmission, as may be necessary, to verify status of equipment; adjust operating conditions; or correct any abnormal condition; or (E) Confirmation of status, or that an operation or correction has been accomplished. (ii) The maximum duration of any one non-voice signal may not exceed 2 seconds and shall not be transmitted more than three times. (iii) Systems employing automatic interrogation shall be limited to nonvoice techniques and shall not be activated for this purpose more than 10 seconds out of any 60second period. This 10-second frame includes both transmit and response times. (iv) The bandwidth shall not exceed that authorized to the licensee for the primary operation on the frequency concerned. (v) Frequency loading resulting from the use of secondary signaling will not be considered in whole or in part as a justification for authorizing additional frequencies in the licensee's mobile system. (vi) A mobile service frequency may not be used exclusively for secondary signaling. (vii) The output power shall not exceed 30 watts (at the remote site). (viii) A1D, A2D, F1D, or F2D emission may be authorized. (ix) The transmitter shall be designed to deactivate automatically after 3 minutes of continuous carrier radiation. (xiii) Operational fixed stations authorized under this paragraph are exempt from the requirements of §§90.137(b), 90.429(d), 90.425 and 90.433. (xi) On these frequencies, base, mobile relay or mobile stations may transmit secondary tone or impulse signals to receivers, as provided in this section.
- (83) Telemetry operations on this frequency will be authorized pursuant to §90.267(f).
- (87) Operation on this frequency is subject to the low power provisions of §90.267(f). This frequency is assigned to Group D in the low power pool.

90.267 Changes:

- (f) *Group D Frequencies*. The Industrial/Business Pool frequencies in Group D are available for central station alarm operations on a coordinated basis, pursuant to §§90.35(b)(2) and 90.175(b). Central station alarm signaling on these frequencies will be co-primary with regard to co-channel or adjacent channel base, mobile or data operations. Voice operations will not be allowed on Group D Channels.
- (1) Base, mobile or operational fixed stations will be authorized on Group D frequencies. Fixed stations may be licensed as mobile.
- (2) Group D frequencies subject to \$90.35(c)(63) are limited to central station alarm use within the urban areas described in \$90.35(c)(63). Outside the urban areas described in

§90.35(c)(63), Group D frequencies subject to §90.35(c)(63) are available for general Industrial/Business use on a coordinated basis, pursuant to §§90.35(b)(2) and 90.175(b).

- (3) Group D frequencies subject to \$90.35(c)(66) are limited to central station alarm use nationwide.
- (4) Operation on Group D frequencies is limited to 2 watts output power for mobile, base or operational fixed stations. Fixed stations used for central station alarm operations may utilize antennas mounted not more than 7 meters (20 feet) above a man-made supporting structure, including antenna structure.
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460/465.90625	460/465.95625	461/466.00625
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